



Harambee Institute of Science and Technology

Charter School

638-40 N. 66th Street Philadelphia, PA 19151

(215) 472-8770 ☎ (215) 472-9611/Fax

www.harambeecs.org

Jay Caldwell, Business Manager
Harambee Charter School
630-640 N 66th Street,
Philadelphia, PA 19151
(267) 615-3899

September 11, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Dear Ms. Dortch,

Re: WC DOCKET NO. 02-60
Applicant: **Harambee Charter School**
BEN: **228148**
Form 471 number: **874945**
SPIN: **143023669**
FRN# **2388622**
Appeal Letter: **"Administrator's Decision on Appeal – Funding Year 2012-2013"**
Decision we are appealing: **"Approved"**

I am writing to appeal USAC's decision on the abovementioned FRN to approve the funding at the originally submitted discount level of 80%. (Please see enclosed for a copy of the "Administrator's Decision on Appeal – Funding Year 2012-2013" letter that we are appealing on)

I understand that in our Form 471 application, the discount level submitted was for 80%. However, I believe that USAC has a rule that allows schools to amend their applications or correct any ministerial and clerical errors during the PIA review process until an FCDL is issued. On January 16, 2013, I received a set of review questions from PIA reviewer, Mr. Louis S. Batoff. Item II of the letter is regarding "Discount Validation" for our school. We responded to this review and submitted documentations that proof our school's discount level to be at 90%. I have enclosed the supporting documentations in this letter for your perusal. (A copy of the survey certification and a copy of a filled up survey form by a student)

Mr. Louis Batoff reviewed our documents and made an error in his calculation and had approved our application at 60% discount instead. We then submitted an appeal regarding this FCDL issued. As we were able to proof our discount level at 90% with the documentations, the appeal was successful and the discount level for the application was reverted back to 90%.

However, we are very disappointed and puzzled to be receiving the "Administrator's Decision on Appeal – Funding Year 2012-2013" letter reverting the discount level back to 80% citing the reason that the FRN should be approved for funding at the originally submitted discount level of 80%.

I believed that throughout the entire review process, we have followed the program rules thoroughly and closely. According to USAC's program rules, our school had submitted documentations during the PIA review process to proof our discount level at 90% and this was before FCDL was issued.

Therefore, I strongly urged for FCC to review in full the process we have undergone and kindly approve this appeal so that our school can fully utilized the funding for the benefits of our students. Erate funding is crucial to our school and most definitely for our students.

Please feel free to contact me via my cell phone at 267-615-3899, or via email jcaldwell@histcs.org, should more information be required from us in order to help you with your assessment of our appeal.

I appreciate the time you have taken to read my letter and I look forward to hear from you soon.

Thank you very much.

Yours Faithfully

Jay Caldwell
Business Manager
Harambee Charter School

Enclosed:

- ☒ Letter "Administrator's Decision on Appeal – Funding Year 2012-2013" that we are appealing on
- ☒ A copy of our Income Survey Certification Letter
- ☒ A copy of a filled up income survey form
- ☒ A copy of the set of review questions received on January 16, 2013 for 471 Application 874945



Schools and Libraries Division

Jan 16, 2013

Jay Caldwell

HARAMBEE CHARTER SCHOOL

Telephone:

(215) 4728770 Ext 304

Application Number

874945

Response Due Date: JANUARY 31, 2013

The Program Integrity Assurance (PIA) team is in the process of reviewing all Funding Year 2012 FCC Form 471 Applications to ensure that they are in compliance with the rules of the Universal Service program. We are currently in the process of reviewing your Funding Year 2012 FCC Form 471 Application. To complete our review, we need some additional information. The information needed to complete the review is listed below.

ITEM I

FRN 2388772

Based on the review of your Funding Year 2012 FCC Form 471 application 874945, for FRN 2388772, the documentation you provided in your Item 21 Attachments is not sufficient to determine the eligibility of your request. The documentation does not sufficiently describe the products and services being requested, so we cannot determine the eligibility of your request.

Please forward a copy of the vendor invoice (ALL PAGES) to support your request in the amount of \$6035.74.

Please make certain you send all pages of the Verizon invoice

Please provide more detailed documentation, such as the portion of the bill that identifies the actual products and services being delivered. If the bill you receive does not identify the specific products and services being delivered, you will need to contact your vendor and request such documentation. A telecommunications carrier should be able to provide you with a detailed statement identifying the specific products and services being provided, which is sometimes called a Bill Breakdown or Detailed Charge Report with Service Descriptions. If your carrier cannot provide you with such a statement, please have them provide you with itemized billing or documentation that specifically details the services being delivered.

Please keep in mind that your supporting documentation should be the documentation or data used to prepare your FCC Form 471 application and should clearly identify any ineligible charges that were cost allocated out of your request. Examples of supporting documentation are

contracts, vendor quotes, vendor bills, invoices, etc. If you are unable to justify the charges requested on your FCC Form 471, the request may be reduced or denied.

ITEM II

DISCOUNT VALIDATION

Based upon review of your Funding Year 2012 FCC Form 471 application, we were not able to validate your requested discount percentage of 80% for **228148 HARAMBEE CHARTER SCHOOL**. In order to validate this discount percentage, please provide the appropriate documentation as described in the options listed below.

Option 1. If the school participates in the National School Lunch Program (NSLP), please provide a signed copy (preferably by the Principal, Vice-Principal, Superintendent or Director of Food Services) of a Reimbursement Claim Form that the school sends to the state each month as part of their participation in the program. Make sure that the following three items are identified on the claim form:

- a. The entity name
- b. The total number of students enrolled at the entity
- c. The total number of students eligible for participation in the Free or Reduced Lunch Program for the entity

If the school district fills out an aggregate claim form for the school, please provide a signed letter on school letterhead from a school official (preferably the Superintendent or other chief school official) that lists the enrollment and Free/Reduced information for each school in the district. The enrollment and Free/Reduced information provided in your letter should match the information that appears on the claim form.

Option 2. If the discount percentage was determined by information obtained from an income survey or application (NSLP Lunch Application forms cannot be used as survey or application instruments), please provide the following information on school letterhead signed by a chief school official (such as the Principal, Vice Principal, Superintendent or Director of Food Services):

- a. Total number of students enrolled at the school
- b. Total number of surveys/applications sent out (If a single survey is sent to households with more than one student, please indicate the total number of students represented by the surveys)
- c. Total number of surveys/applications returned (If a single survey is sent to households with more than one student, please indicate the total number of students represented by the surveys)
- d. Total number of students qualified for participation in NSLP based upon the information provided in the returned surveys/applications
- e. Are the surveys/applications and results kept on file? ☐ Yes ☐ No
 - a. If so, for how long are they kept on file?
- f. A statement that confirms that only students who meet the Income Eligibility Guidelines of the National School Lunch Program have been included in Column 5 of Item 9a of Block 4 of the FCC Form 471

Provide a sample copy of a FILLED OUT SURVEY OR APPLICATION with the child's personal information crossed out for confidentiality. **Be advised that in order for a survey to be acceptable it must contain the family's name, student's name, the**

size of the family and the income level of the family.

A school cannot include in their numbers other alternative methods, such as sibling match, direct certification etc., and then extrapolate as well. Schools may combine multiple alternative methods, such as survey results, sibling match, direct certification etc., but must ensure that the same students are not counted multiple times, and cannot extrapolate the results from multiple surveys.

Option 3: (non-public schools): If the discount percentage was determined by information obtained from a financial aid form, please provide the following information in writing on school letterhead signed by a school official (such as the Principal, Vice Principal, Superintendent, or chief school official):

- a. Total number of students enrolled
- b. A statement that confirms "all students have access to financial aid forms
- c. A statement that confirms that financial aid applicants are required to submit Federal Tax forms to document family income
- d. A statement that confirms the number of students who meet the NSLP Income Guidelines
- e. A statement that confirms the number and percentage of eligible students that supports the requested E-rate discount level
- f. A statement that confirms the school keeps all completed financial aid application on file.
- g. A statement that confirms that only students who meet the Income Eligibility Guidelines of the National School Lunch Program have been included in Column 5 of Item 9a of Block 4 of the Form 471

The school must submit one completed financial aid application, with personal information blackened out. The financial aid application must have been completed within two years of the start of the fund year.

Option 4: Provide a letter from your State Department of Education (on state letterhead and signed by a chief official at the State Department of Education) verifying that the total student enrollment and the free and reduced figures you provided are accurate.

Option 5: Provide a letter from your State Food/ or Nutrition Service Authority officials (on state letterhead and signed by a chief official of the State or Nutrition Service Authority) verifying the total student enrollment and the free and reduced figures you provided are accurate.

Option 6: If the discount percentage was determined using a different method than any of the methods identified above, please clearly describe and explain the survey method that was used and provide all relevant data, forms, or other tools that were used during the survey process.

ITEM III

Based on the review of the documentation you provided, your Funding Year 2012 FCC Form 471 application # 874945, FRN 2388685, 2388730 appears to be a request for the same service as Funding Year 2012 FCC Form 471 Application # 849505, FRN2383224, 2387213.

Duplicative services are defined as services that deliver the same functionality to the same population in the same location during the same period of time. If the FRNs are duplicates, then one of the FRNs must be cancelled.

Are the above referenced FRNs providing duplicative services? ☐ Yes ☐ No

If Yes, please send us written authorization to cancel the FRN that is providing duplicative services. Please specify which FRN -you wish to cancel in your written reply.

If No, please provide third-party documentation verifying that the requests are not duplicates. Examples of documentation verifying that the FRNs are not duplicates are bills verifying different recipients of service, signed copies of contracts verifying different services being delivered, or other detailed information specifying the recipients of service and/or types of services being provided

If these services are being ordered from a State Master Contract, you do not have to submit a copy of the signed contract if that contract is available online or has already been submitted to us during a prior application review. However, please provide us with the State Master Contract name and number.. If you have already submitted the relevant contract information in connection with another FCC Form 471 application review, please provide the FCC Form 471 application number involved so we can locate the relevant contract in our files.

Please see the Eligible Services list at http://www.usac.org/res/documents/sl/pdf/ESL_archive/EligibleServicesList-2012.pdf for additional information on duplicative services.

Please fax or email the requested information to my attention. If you have any questions or if you require a further explanation of this request, please feel free to contact me.

It is important that we receive all of the information requested **within 15 calendar days** so we can complete our review. **Failure to respond may result in a reduction or denial of funding. If you need additional time to prepare your response, please let me know as soon as possible.**

Should you wish to cancel your FCC Form 471 application(s), or any of your individual funding requests, please clearly indicate in your response that it is your intention to cancel an application or funding request(s). Include in any cancellation request the FCC Form 471 application number(s) and/or funding request number(s), and the complete name, title and signature of the authorized individual.

Thank you for your cooperation and continued support of the Universal Service Program.

Louis S. Batoff
Associate Manager, Program Integrity Assurance
30 Lanidex Plaza West | Parsippany, NJ 07054
T: 973.581.5019 | F: 973.599.6521
Louis.Batoff@sl.universalservice.org



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September 11, 2013

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Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Dear Ms. Dortch,

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Applicant: **Harambee Charter School**
BEN: **228148**
Form 471 number: **849505**
FRN#s: **2383224, 2383521, 2387213**
SPIN #s: **143003990, 143023669, 143003990**
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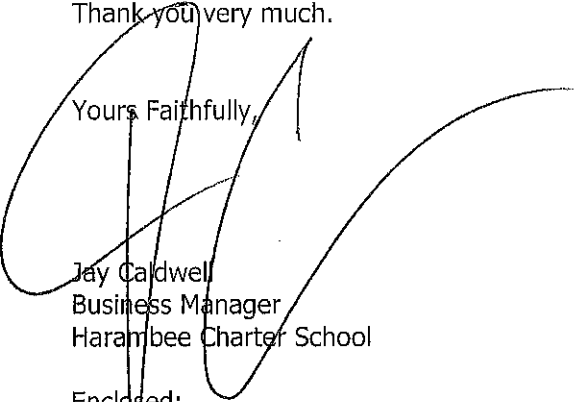
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Schools and Libraries Division

Jan 16, 2013

Jay Caldwell
HARAMBEE CHARTER SCHOOL
Telephone:
Application Number

(215) 4728770 Ext 304
849505

Response Due Date: JANUARY 31, 2013

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ITEM II

Based on the review of the documentation you provided, your Funding Year 2012 FCC Form 471 application # 849505, FRN 2383224, 2387213 appears to be a request for the same service as Funding Year 2012 FCC Form 471 Application # 874945, FRN 2388685, 2388730.

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Are the above referenced FRNs providing duplicative services? ☐ Yes ☐ No

If Yes, please send us written authorization to cancel the FRN that is providing duplicative services. Please specify which FRN -you wish to cancel in your written reply.

If No, please provide third-party documentation verifying that the requests are not duplicates. Examples of documentation verifying that the FRNs are not duplicates are bills verifying different recipients of service, signed copies of contracts verifying different services being delivered, or other detailed information specifying the recipients of service and/or types of services being provided

If these services are being ordered from a State Master Contract, you do not have to submit a copy of the signed contract if that contract is available online or has already been submitted to us during a prior application review. However, please provide us with the State Master Contract name and number.. If you have already submitted the relevant contract information in connection with another FCC Form 471 application review, please provide the FCC Form 471 application number involved so we can locate the relevant contract in our files.

Please see the Eligible Services list at http://www.usac.org/res/documents/sl/pdf/ESL_archive/EligibleServicesList-2012.pdf for additional information on duplicative services.

ITEM III

Based on the information you provided on your Funding Year 2012 FCC Form 471 application #849505 FRN2387213 is a duplicate funding request of a prior-year FRN that is not yet approved or under appeal by USAC.

Duplicative services are defined as services that deliver the same functionality to the same population in the same location during the same period of time. If the above referenced FRNs

are providing duplicative, funding cannot be approved for both FRNs.

Was FCC Form 471 application 849505, Block 5, Item # 10 checked by you in error? ☐ Yes
☐ No.

If Yes, please provide a written explanation of the error on school letterhead, signed and dated by the school Superintendent or other chief school official. Please also provide third-party documentation showing that these FRNs are not providing duplicative services. Examples of acceptable documentation verifying that the FRNs are not duplicates are bills verifying different recipients of service, signed copies of contracts verifying different services being delivered, or other detailed information specifying the recipients of service and/or types of services being provided.

If No, and funding has not yet been approved for the prior year FRN or you have a pending Appealed with USAC related to the prior-year FRN, please provide a signed written authorization to cancel one of the FRNs. Please, specify which FRNs you wish to cancel.

If you prefer to have the review your current Funding Year 2012 FCC Form 471 application put on hold pending the funding decision on the prior-year FRN, please send a written authorization requesting that the current Funding Year 2012 review be placed on hold until the funding decision on the prior-year FRN is determined. The review of the current Funding Year 2012 FCC Form 471 application will continue after the funding commitment decision is made on the prior-year FRN.

Please see the Eligible Services list at http://www.usac.org/res/documents/sl/pdf/ESL_archive/EligibleServicesList-2012.pdf for additional information on duplicative services.

Please fax or email the requested information to my attention. If you have any questions or if you require a further explanation of this request, please feel free to contact me.

It is important that we receive all of the information requested **within 15 calendar days** so we can complete our review. **Failure to respond may result in a reduction or denial of funding. If you need additional time to prepare your response, please let me know as soon as possible.**

Should you wish to cancel your FCC Form 471 application(s), or any of your individual funding requests, please clearly indicate in your response that it is your intention to cancel an application or funding request(s). Include in any cancellation request the FCC Form 471 application number(s) and/or funding request number(s), and the complete name, title and signature of the authorized individual.

Thank you for your cooperation and continued support of the Universal Service Program.

Louis S. Batoff
Associate Manager, Program Integrity Assurance
30 Lanidex Plaza West | Parsippany, NJ 07054
T: 973.581.5019 | F: 973.599.6521
Louis.Batoff@sl.universalservice.org